

Message

From: Javier Macias [Javier.Macias@carrizo.com]
Sent: 8/14/2018 2:10:04 PM
To: Hambrick, Amy [Hambrick.Amy@epa.gov]
Subject: RE: OOOOa Annual Report Question
Attachments: Part 60 Subpart OOOOa - 60.5420a(b) Annual Report (Spreadsheet Template).xlsx

Hi Amy. Can the Quad Oa annual report spreadsheet (attached) be unlocked (in particular, the "fugitive emissions component" and "site information" sheets)? Many of the sheet tools like filtering, sorting, etc. are greyed out and inoperable.

Thanks.

From: Hambrick, Amy [mailto:Hambrick.Amy@epa.gov]
Sent: Wednesday, August 01, 2018 11:04 AM
To: Javier Macias
Subject: [EXT] re: OOOOa Annual Report Question

Hi Javier-

The short answer: No, it is still considered draft.

The long answer:

The reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website you referenced is still considered "draft", the requirement to submit only through CEDRI is not triggered. Once the report is "final" then CEDRI reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the **[final]** form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

"You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted."

Furthermore, as you may know, after OOOOa was finalized in 2016, EPA received administrative petitions seeking reconsideration of various aspects of the 2016 NSPS. EPA sent letters to petitioners granting reconsideration on April 18, 2017 and on June 5, 2017, EPA issued a *Federal Register* notice granting reconsidering on additional requirements.

When EPA proposes amendments to OOOOa and updates the reporting template, the public will have an opportunity to comment on the template to help make it better. Be sure to stay plugged in and submit your comments when the opportunity comes round.

I'd be happy to answer any specific question you had on the report itself and or get you in touch with someone at your local EPA Regional office to assist.

Amy

Amy Hambrick
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